

<u>SUBJECT</u>		<u>DATE</u>
1056. PCB Reporting and Recordkeeping Relief	ENCORE	JAN 12, 2014
1057. Commercial Chemical Products and Unused Batteries	ENCORE	JAN 16, 2014
1058. PCB Annual Records Retention Timeframes		JAN 31, 2014
1059. Satellite Accumulation within a ≤90-day Accumulation Area		FEB 7, 2014
1060. PCB Certificate of Disposal Relief	ENCORE	FEB 13, 2014
1061. Used Oil and Weekly Inspections		FEB 20, 2014
1062. Bags and RCRA Container Definition		FEB 27, 2014
1063. Product Storage Tank Residues and Hazardous Waste Regulations	ENCORE	MAR 6, 2014
1064. Spent Lead-Acid Batteries and Accumulation Time Limits		MAR 13, 2014
1065. Land Disposal Restrictions and Dates of Accumulation		MAR 23, 2014
1066. Universal Waste Accumulation Time Limits and the One Year Rule		MAR 29, 2014
1067. PCB Manifest Discrepancy Reports and Estimated Waste Weights		APR 6, 2014
1068. PCB Wastes, Independent Transporters and Confirmation of Receipt		APR 10, 2014
1069. Paint Wastes and The Applicability of the F001-F005 Listings to Ingredients	ENCORE	APR 20, 2014
1070. Other Paint Wastes and the Applicability of the F001-F005 Listings	ENCORE	APR 24, 2014
1071. Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents		MAY 1, 2014
1072. TSCA "No PCBs" versus "Non-PCBs" versus "Nondetectable PCBs"	ENCORE	MAY 8, 2014
1073. Purpose of Keeping a Hazardous Waste Container Closed	ENCORE	MAY 15, 2014
1074. PCB Containers and Multiple Removed From Service Dates		MAY 22, 2014
1075. Satellite Accumulation and RCRA Personnel Training		MAY 29, 2014
1076. Transporter Signatures on Hazardous Waste Manifest and Multiple Drivers		JUN 5, 2014
1077. Universal Waste and Nonhazardous Batteries		JUN 12, 2014
1078. Universal Waste and Incandescent Bulbs		JUN 19, 2014
1079. The PCB Mark and the Fields "Also Contact" and "Tel No"	ENCORE	JUN 29, 2014
1080. Halon Fire Extinguishers - Banned or Not Banned?	ENCORE	JUL 5, 2014
1081. Cabinets as RCRA Containers	ENCORE	JUL 13, 2014
1082. LDR Storage Prohibitions and Treated Wastes	ENCORE	JUL 17, 2014
1083. LDR Treatment Standards and F001 "Chlorinated Fluorocarbons"	ENCORE	JUL 24, 2014
1084. RCRA Regulatory Status of Chlorinated Fluorocarbons Used as Refrigerants	ENCORE	JUL 31, 2014
1085. Universal Wastes, Manifesting and DOT Shipping Names		AUG 7, 2014
1086. CERCLA Hazardous Substances – A Brief Definition		AUG 14, 2014
1087. CERCLA Hazardous Substances – The Petroleum Exclusion		AUG 21, 2014
1088. PCB Concentration Assumptions for Use vs. PCB Disposal	ENCORE	AUG 28, 2014
1089. Universal Waste and Basis for the One Year Accumulation Time Limit		SEP 4, 2014
1090. Product Spills and Waste Determinations	ENCORE	SEP 11, 2014
1091. PCB Concentrations and 10,000 PPM		SEP 18, 2014
1092. PCB Concentrations and 1,000 PPM		SEP 25, 2014
1093. Universal Waste Alkaline Batteries and Self-Transportation		OCT 2, 2014
1094. Universal Waste Lithium Batteries and Self-Transportation		OCT 9, 2014
1095. Universal Waste Batteries and Closed Containers	ENCORE	OCT 16, 2014
1096. PCB Containers and Concentration of PCBs		OCT 23, 2014
1097. Recyclable Chemicals and Zombie Destruction		OCT 31, 2014
1098. Satellite Accumulation Requirements in Washington State	ENCORE	NOV 6, 2014
1099. Satellite Accumulation and "At or Near"		NOV 13, 2014
1100. Regulatory Status of Chromated, Copper, Arsenate, (CCA) Wood as Wood Mulch	ENCORE	NOV 20, 2014
1101. Defining Criteria for Household Waste Exclusion	ENCORE	NOV 26, 2014
1102. The Household Waste Exclusion and Renovation Debris		DEC 4, 2014
1103. The Household Waste Exclusion and Renovation Debris – Part II		DEC 11, 2014
1104. PCB Ballasts and Disposal Options	ENCORE	DEC 18, 2014

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TWO MINUTE TRAINING

TO: CH2M HILL PLATEAU REMEDIATION COMPANY

FROM: PAUL W. MARTIN, Senior Environmental Compliance Officer
CHPRC Environmental Protection, Hanford, WA

SUBJECT: PCB BALLASTS AND DISPOSAL OPTIONS

DATE: DECEMBER 18, 2014

<u>CHPRC Projects</u>	<u>CH PRC - Env. Protection</u>	<u>MSA</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
Richard Austin Tania Bates Ty Blackford Bob Cathel Rene Catlow Richard Clinton Larry Cole John Dent Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Jeanne Kisielnicki Melvin Lakes Jim McGrogan Stuart Mortensen Anthony Nagel Dean Nester Dave Richards Phil Sheely Connie Simiele Roni Swan Michael Waters Jeff Westcott Jeff Widney	Brett Barnes Ron Brunke Bill Cox Lorna Dittmer Rick Engelmann Ted Hopkins Jim Leary Dale McKenney Jon McKibben Rick Oldham Linda Petersen Fred Ruck Jennie Seaver Wayne Toebe Lee Tuott Daniel Turlington Dave Watson Joel Williams	Jerry Cammann Jeff Ehliis Garin Erickson Lori Fritz Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Saul Martinez Jon Perry Thomas Pysto Don Rokkan Lana Strickling Lou Upton Christina Zerby	Alan Campbell Grant McCalmant <u>DOE RL, ORP, WIPP</u> Mary Beth Burandt Cliff Clark Mike Collins Tony McKarns Ellen Mattlin Greg Sinton Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Greta Davis Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Dan Kimball Megan Lerchen Richard Lipinski Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Judith Nielsen Mandy Pascual Kirk Peterson Jean Quigley	Mark Rollison Dan Saueressig Merrie Schilperoort Joelle Stamm Glen Triner Greg Varljen Julie Waddoups Kyle Webster Ted Wooley

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TWO MINUTE TRAINING

SUBJECT: PCB Ballasts and Disposal Options

Q: A customer has two drums of PCB fluorescent light ballasts. One drum contains ballasts with intact and nonleaking PCB small capacitors and <50 ppm PCBs in the potting (insulating) material, while the other drum contains ballasts with intact and nonleaking PCB small capacitors and PCBs ≥ 50 ppm in the potting material. The customer does not want to use expensive incineration or get involved in complex sampling and analysis for both drums. How can the customer determine disposal options for these ballasts?

A: Per 40 CFR 761.50(b)(2)(i), fluorescent light ballasts containing PCBs only in intact and non-leaking PCB Small Capacitors are regulated for disposal under 40 CFR 761.60(b)(2)(ii). This means that the intact, nonleaking ballasts with no PCBs in the potting material can be landfilled as municipal solid wastes.

Then per 40 CFR 761.50(b)(2)(ii), fluorescent light ballasts containing PCBs in the potting material ≥ 50 ppm are regulated for disposal as PCB bulk product waste under §761.62. This means that the ballasts with PCBs ≥ 50 ppm in the potting material could be disposed by any of the following options:

1. In a TSCA incinerator
2. Under a PCB alternate disposal approval
3. In accordance with PCB decontamination provisions
4. For metal surfaces in contact with PCBs, per thermal decontamination provisions
5. In accordance with a TSCA PCB Coordinated Approval
6. In a TSCA chemical waste landfill
7. In a RCRA permitted hazardous waste landfill.

Therefore the customer could dispose of the nonleaking ballasts with <50 ppm PCBs in the potting material at a municipal solid waste landfill; and the nonleaking ballasts with PCBs ≥ 50 ppm in the potting material at a TSCA or RCRA approved facility. Note that a nonintact/leaking PCB Small Capacitor would also require management in one of the specified TSCA or RCRA facilities regardless of the PCB concentrations in the potting material.

SUMMARY:

- Fluorescent light ballasts with nonleaking PCB Small Capacitors and <50 ppm PCBs in the potting material can be disposed in a municipal solid waste landfill.
- Fluorescent light ballasts with nonleaking PCB Small Capacitors and ≥ 50 ppm PCBs in the potting material must be disposed in a TSCA or RCRA approved facility.
- Fluorescent light ballasts with leaking PCB Small Capacitors, regardless of PCB concentrations in the potting material must also be disposed in a TSCA or RCRA approved facility.

Excerpts from 40 CFR 761.50, 761.60, 761.62, and excerpts from the EPA PCB Q and A Manual are attached to the e-mail. If you have any questions, please contact me at "Paul_W_Martin@rl.gov" or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 12/18/14

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Ballasts and Disposal Options

40 CFR 761.50 Applicability.

(b) PCB waste.

(2) PCB Items. Any person removing from use a PCB Item containing an intact and non-leaking PCB Article must dispose of it in accordance with §761.60(b), or decontaminate it in accordance with §761.79. PCB Items where the PCB Articles are no longer intact and non-leaking are regulated for disposal as PCB bulk product waste under §761.62(a) or (c).

(i) Fluorescent light ballasts containing PCBs only in an intact and non-leaking PCB Small Capacitor are regulated for disposal under §761.60(b)(2)(ii).

(ii) Fluorescent light ballasts containing PCBs in the potting material are regulated for disposal as PCB bulk product waste under §761.62.

40 CFR 761.60 Disposal requirements.

(b) PCB articles.

(2) PCB Capacitors.

(ii) Any person may dispose of PCB Small Capacitors as municipal solid waste, unless that person is subject to the requirements of paragraph (b)(2)(iv) of this section.

40 CFR 761.62 Disposal of PCB bulk product waste.

PCB bulk product waste shall be disposed of in accordance with paragraph (a), (b), or (c) of this section. Under some of these provisions, it may not be necessary to determine the PCB concentration or leaching characteristics of the PCB bulk product waste. When it is necessary to analyze the waste to make either of these determinations, use the applicable procedures in subpart R of this part to sample the waste for analysis, unless EPA approves another sampling plan under paragraph (c) of this section.

(a) Performance-based disposal. Any person disposing of PCB bulk product waste may do so as follows:

- (1) In an incinerator approved under §761.70.
- (2) In a chemical waste landfill approved under §761.75.
- (3) In a hazardous waste landfill permitted by EPA under section 3004 of RCRA, or by a State authorized under section 3006 of RCRA.
- (4) Under an alternate disposal approval under §761.60(e).
- (5) In accordance with the decontamination provisions of §761.79.
- (6) For metal surfaces in contact with PCBs, in accordance with the thermal decontamination provisions of §761.79(c)(6).
- (7) In accordance with a TSCA PCB Coordinated Approval issued under §761.77.

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Ballasts and Disposal Options

January 2009 Version Revisions to the PCB Q and A Manual

Q: *How must I dispose of fluorescent light ballasts with PCBs in the potting material?*

A: This depends on the concentration of PCBs in the potting material and whether the ballast contains an intact or non-intact PCB small capacitor. **If** the PCB concentration of the potting material is <50 ppm and the ballast contains either no PCB small capacitor or an intact and non-leaking PCB small capacitor, you can dispose of the ballast as municipal solid waste (see §761.60(b)(2)(ii)). **If** the PCB concentration of the potting material is ≥50 ppm and the ballast contains either no PCB small capacitor or an intact and non-leaking PCB small capacitor, you can dispose of the ballast as PCB bulk product waste in a TSCA incinerator, a TSCA/RCRA landfill, a facility permitted, licensed, or registered by a state as a municipal or non-municipal non-hazardous waste landfill, or by means of an approved destruction method, decontamination, or risk-based disposal method (see §761.62). **Regardless** of the PCB concentration of the potting material, you must dispose of ballasts containing non-intact or leaking capacitors as PCB bulk product waste in accordance with §761.62(a) or (c).

TSCA Disposal Requirements for Fluorescent Light Ballasts

PCB Capacitor	PCB Potting Material	Labeling, Transportation and Manifesting for Disposal	Disposal References	Disposal Options
"No PCBs" mark	N/A	Non-TSCA	N/A	Non-TSCA
None (No capacitors)	<50 ppm	Non-TSCA	N/A	Non-TSCA
Intact and Non-leaking or None	≥ 50 ppm	<ul style="list-style-type: none"> • Is a PCB Bulk Product Waste • No marking is required • Manifest required for 761.62(a) • Manifest not required for 761.62(b) • Manifest may be required for 761.62(c) 	761.50(b)(2)(ii) 761.62(a) – (c)	<ul style="list-style-type: none"> • TSCA incinerator - 761.70 • TSCA/RCRA Landfill - 761.75 • Alternate Destruction Method - 761.60(e) • Decontamination - 761.79 (761.65(d) storage approval may be required) • Coordinated approval - 761.77 • State landfill (leach test) - 761.62(b) • Risk-based approval - 761.62(c)
Intact and Non-leaking	<50 ppm	No marking or manifesting required	761.50(b)(2)(i) 761.60(b)(2)(ii)	Municipal solid waste or 761 Subpart D options
Leaking	<50 or ≥50 ppm	<ul style="list-style-type: none"> • Disposal as PCB Bulk Product Waste • No marking is required • Manifest required for 761.62(a) • Manifest may be required for 761.62(c) 	761.62(a) or 761.62(c)	<ul style="list-style-type: none"> • TSCA incinerator - 761.70 • TSCA/RCRA Landfill - 761.75 • Alternate Destruction Method - 761.60(e) • Decontamination - 761.79 (761.65(d) storage approval may be required) • Decontamination - 761.79 • Coordinated approval - 761.77 • Risk-based approval - 761.62(c)

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